

**SEALED**

## UNITED STATES DISTRICT COURT

for the

Northern District of Texas

**FILED****August 9, 2022**

KAREN MITCHELL

CLERK, U.S. DISTRICT

COURT

United States of America )

v. )

Martin Leija (1), Vincent Gomez (2), )

Felipe Villasenor (3), and Juan )

Labrada Jr. (4) )

Case No.

3:22-MJ- 776-BT

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2022 to August 9, 2022 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 846  
 841 (a)(1)

Conspiracy to Possess with the Intent to Distribute a Mixture  
 and Substance Containing a Detectable Amount of Cocaine

This criminal complaint is based on these facts:

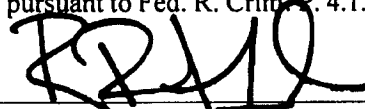
See attached Affidavit written by SA Andrew Versocki

☒ Continued on the attached sheet.*Complainant's signature*

SA Andrew Versocki

*Printed name and title*

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: August 9, 2022*Judge's signature*City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

AFFIDAVIT

I, Andrew Versocki, after being duly sworn, depose and say as follows:

Introduction

I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant I have been a DEA agent for approximately three years, and I am currently assigned to the Dallas Field Division. In 2018, I attended the DEA basic training academy located in Quantico, Virginia. There, I received training in investigating drug offenses, drug conspiracies, and financial crimes. I also received training in undercover operations, electronic surveillance, interviewing confidential sources, executing searches and seizures, writing affidavits to support arrest and/or search warrants, recognizing drugs, exploiting communication devices, use of force, clandestine laboratory and laboratory procedures, internet investigation training, and asset forfeiture training. Since May 2018, I have been assigned to the Dallas Field Division where I have conducted and participated in investigations involving violations of the drug laws of the United States including violations of 21 U.S.C. §§ 841(a)(1), and 846. I am familiar with and have used various investigative methods including but not limited to, visual surveillance, electronic surveillance, general questioning of

witnesses, the use of search warrants, and the use of confidential sources. I have been an affiant on GPS tracking orders, search and arrest warrants, and court-authorized wiretaps.

### **Preface**

1. I have probable cause to believe that Martin Leija, Vincent Gomez, Felipe Villaseñor, and Juan Labrada Jr. have violated 21 U.S.C. §§ 846 and 841 (a)(1), that is, Conspiracy to Possess with the Intent to Distribute Cocaine, a Schedule II controlled substance. My knowledge of the facts alleged in this affidavit arise from my personal participation and observations in this investigation, my interviews of informants, and my review of reports prepared by investigators of the DEA Dallas Field Division and other participating law enforcement officers. Since this affidavit is limited to establishing probable cause, I have not included every fact known to me and other investigators. Rather, I am only submitting the facts necessary to establish probable cause that Martin Leija, Vincent Gomez, Felipe Villaseñor, and Juan Labrada Jr. conspired to possess with the intent to distribute cocaine, a Schedule II controlled substance.

### **Investigation**

1. In April 2022, a DEA Confidential Source (CS) identified Martin Leija as a cocaine distributor in the Dallas, Texas area. On June 15, 2022, United States District Judge Jane Boyle, Northern District of Texas, signed an order authorizing a Title-III wiretap on Leija's phone. Agents activated the wiretap later that day.

**A. On July 9, 2022, Martin Leija, and Vincent Gomez distribute 15 ounces of cocaine to Juan Labrada Jr. for further distribution.**

2. On July 9, 2022, agents intercepted a series of telephone calls and text messages between Leija and Gomez regarding selling 15 ounces of cocaine to a subject identified as Juan Labrada Jr. At about 6:36 p.m., Gomez called Leija. During the call, Leija and Gomez arranged to meet Labrada Jr. Gomez stated, "Somewhere close like, shit, you can just jump on 20, shoot on 20 to Cockrell Hill just...I gotta go right there off of 67 and Cockrell Hill. In that neighborhood right there. I'm a just go get that shit...I want to meet him close right there. Because I gotta go shoot back to my sister's to go drop the money off too, you know what I'm saying. I'm not trying to go too far from there." Leija stated, "We'll probably just meet at the spot right there." Gomez asked, "Where?" Leija stated, "At Players."

Based on the preceding call, agents believe that Gomez told Leija that he had to collect the cocaine from 1110 De Havilland Avenue, Duncanville, Texas, and that he didn't want to travel far from that location since he planned on returning to 1110 De Havilland with the drug proceeds.

3. At about 6:45 p.m., agents established surveillance at Players Sports Bar located at 4444 West Illinois Avenue, Dallas, Texas. At about 7:29 p.m., Leija called Labrada Jr. Labrada Jr. stated it would be about 30 minutes. At about 7:30 p.m., Leija called Gomez and stated it would be 25 minutes. At about 7:43 p.m., Gomez's phone location data indicated he was near Daniieldale Road and

Westmoreland Road in Desoto. This phone location is in close proximity of 1110 De Havilland.

4. At about 8:12 p.m., Labrada Jr. called Leija and stated, "I'm behind you." Leija replied, "I see you." Agents observed Gomez enter the Players parking lot driving a white 2018 Chevrolet Malibu is registered to female believed to be Gomez's girlfriend. Gomez parked near the entrance of Players. Agents observed Leija walking toward Gomez's vehicle and standing outside a grey 2018 Range Rover registered to Juan A. Labrada at an address in Dallas, Texas. Agents observed a skinny Hispanic male with facial hair wearing a white t-shirt in the driver's seat of the Range Rover. The subject was looking down while Leija talked to him. Leija then walked over to Gomez's Malibu and handed him an object through the driver's window. The Range Rover departed the area heading west on Illinois Avenue. Gomez departed the parking lot through an east exit. Leija returned to Players.

5. Later that evening, Labrada Jr. sent Leija a text saying, "All good." Leija responded, "Already. You look at it good." Leija called Labrada Jr. shortly afterward, and Labrada Jr. stated, "It's all good."

6. On July 10, 2022, Gomez texted Leija, "12,200." After a short time, Leija called Gomez and said, "I'm fixing to call. It's still a loss." Leija later stated, "Cause it supposed to be 825 times 15. That's 12,375." Gomez explained to Leija that he forgot to count the 50 ones. Leija later stated, "It was 12, 250, right?" Gomez stated, "Yeah, it was 12,200 and then 50 ones."

Based on the preceding calls, texts, and agents' observations, agents believe that Leija and Gomez sold Labrada Jr. 15 ounces of cocaine for \$825 per ounce. I know from my training and experience that \$825 for an ounce of cocaine is the approximate price for an ounce of cocaine in the Dallas area. Additionally, agents believe that Labrada Jr. paid Leija and Gomez \$12,250, which was \$125 short.

**B. On August 1, 2022, Felipe Villasenor delivers a kilogram of cocaine to Martin Leija and Vincent Gomez.**

7. On July 18, 2022, agents obtained a court order allowing the continued interception of Leija's phone. United States District Judge Karen Gren Scholer, Northern District of Texas, signed the Order. Agents activated that wiretap later that day.
8. On July 28, 2022, at about 9:12 p.m., agents intercepted a call from Felipe Villasenor to Leija. During the call, Leija stated, "What's the ticket?" Villasenor replied, "21." Leija repeated, "21?" Villasenor confirmed. Based on the preceding call, agents believe Villasenor is a cocaine source of supply for Leija, and that Villasenor quoted Leija \$21,000 for a kilogram of cocaine. This price is currently consistent for a kilogram of cocaine in the Dallas area.
9. At about 6:56 p.m. on August 1, 2022, agents intercepted a call from Villasenor to Leija. During the call, Villasenor stated, "I had left my phone over at this hospital and shit...my mom is in the hospital..." Villasenor asked, "You going to be ready or what?" Leija replied, "Yep." Villasenor stated, "I'll be ready in an

hour. I'll call you when I'm on my way." Leija stated, "Alright. Let me call my boy."

10. At about 6:57 p.m., Leija called Gomez. During the call, Leija asked, "Hey, you didn't take that money back yet did you?" Gomez stated, "No." Leija stated, "Alright, well he just called me." Gomez stated, "Oh shit yeah." Leija stated, "He said he'd be ready in an hour." Gomez stated, "Ok, shit, let me know." Leija stated, "I'll tell him just to meet you at that gas station if you still got that bread." Gomez confirmed.

11. At about 6:58 p.m., Leija called Villasenor. During the call, Leija asked, "There's a gas station. Do you remember that gas station?" Villasenor confirmed. At about 7:11 p.m., Leija called Gomez and stated, "I'll let you know. That nigga he don't call me when he's on the way. He just tells me he's exiting." Gomez later asked, "You talking about that Diamond Shamrock." At about 7:12 p.m., Leija called Villasenor and stated, "That Diamond Shamrock, you remember?" Villasenor confirmed.

12. At about 7:15 p.m., agents conducted a surveillance check at Villasenor's residence and observed a white 2020 Mercedes Benz and a black Chevrolet Tahoe parked in the driveway. At about 7:43 p.m., location data from Villasenor's phone indicated the phone was at the residence. Agents then established surveillance at the residence. At about 7:50 p.m., agents observed the Tahoe depart the residence.

13. At approximately 8:03 p.m., Villasenor called Leija and stated, "I'm already here exiting already." Leija asked, "Where are you exiting at? Loop 12

and Illinois?" Villaseñor confirmed. Leija then called Gomez and said, "He's exiting at (U/I)." Gomez asked, "How long it take for him to get here"? Leija stated, "I think he's exiting Loop 12/Illinois. That's what he said. So, about what, 10 minutes." Leija further stated, "I was going to tell you. Weigh it bro. See what it weighs." Gomez confirmed. During the call, surveillance observed the Villaseñor's Tahoe exit Illinois Road from Loop 12.

14. Agents followed Villaseñor in the Tahoe directly to a Diamond Shamrock gas station located at 2995 South Westmoreland Road, Dallas, arriving at about 8:13 p.m. Agents observed Villaseñor park his Tahoe at the gas pumps. At about 8:14 p.m., Leija called Villaseñor and asked, "Are you already right there?" Villaseñor stated, "I'm already right here." Leija then called Gomez, who asked "What's he in?" Leija said, "I don't even know. A Tahoe or a Benz. Either a white Benz or...(U/I)." Gomez stated, "Tell him I'm coming in my girl's car. . . Tell him I'm pulling up in a white car. Try to find out what car he's in." Leija then called Villaseñor and stated, "He's pulling in a white car. What are you driving?" Villaseñor replied, "Tell him to follow me because there's a lot of people out here." Villaseñor stated, "Tell him to follow me to one of these little streets right here."

15. After this call, agents observed Villaseñor's Tahoe depart the gas station. Villaseñor and Gomez in their respective vehicles drove west on Burgoyne Street. Agents observed the two vehicles park on Burgoyne Street near Spruce Valley

Lane. Villasenor approached the Impala and then returned to the Tahoe, carrying a grey package. Villasenor and Gomez then left traveling in opposite directions.

16. At about 8:23 p.m., Leija called Gomez and asked, "Everything good?" Gomez stated, "Yeah. I got it." Gomez later stated, "I'm fixing to bust this hoe open. I'll let you know what it weighs out to." At about 8:25 p.m., Leija texted Villasenor, "It's 21."

17. Leija then called Gomez and asked, "Is it straight?" Gomez replied, "I haven't broken it open yet. I got to get a big Zip-Lock bag so I can do it...I mean the outside looks good. It's stamped and everything." Leija asked, "Is it shiny?" Gomez stated, "Yeah. I just want to see the middle part." A few minutes later, Gomez called Leija and said, "That shit is straight." Gomez later said, "I gotta get rid some of that. I got to pay the babysitter (Laughs)." Leija asked, "Who's the babysitter?" Gomez stated, "My sister...I got to look out for her for holding my shit."

18. Based on the preceding call, agents believe that Gomez gave Villasenor \$21,000 in exchange for one kilogram of cocaine at the Leija's direction.

#### Conclusion

Based upon the information contained in this affidavit, I believe that there is probable cause to believe Martin Leija, Vincent Gomez, Felipe Villasenor and Juan Labrada Jr., have committed violations violated 21 U.S.C. §§ 846 and 841


(a)(1), that is, Conspiracy to Possess with the Intent to Distribute Cocaine, a  
Schedule II controlled substance.



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Andrew Versocki  
Special Agent  
Drug Enforcement Administration

Agent sworn and signature confirmed via reliable electronic means, pursuant to  
Fed. R. Crim. P 4.1.



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Rebecca Rutherford  
United States Magistrate Judge  
Northern District of Texas